National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



April 18, 2012

General Law Practice Group

Reply to Attn of:

TO:

Distribution

FROM:

Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance at a Reception hosted by Association of

Universities for Research in Astronomy (AURA) on April 18, 2012

On April 18, 2012, Association of Universities for Research in Astronomy (AURA), a nonprofit organization under Section 501(c)(3) of the Internal Revenue Code, will host a welcome reception at the L'Enfant Plaza Hotel, in Washington, D.C., at 6:30 p.m. The purpose of this event is to hold a meet and greet prior to AURA's Annual Meeting.

This event will be a widely attended gathering of approximately 90 people, including representatives from academia, the aerospace industry, Federal agencies, congressional offices and AURA members. The estimated cost of the reception, which includes all food and beverages, is \$72 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g)(2). I further determine that there is an Agency interest in NASA personnel attending the event. Moreover, NASA employees whose duties do not substantially affect the event sponsors, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Adam F. Greenstone